

# **Exhibit C**

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**From:** [Patrick Trainor, Esq.](#)  
**To:** [Mulherin, Joseph](#); [Starbuck, Emily](#)  
**Subject:** Re: D'Ambly - Proposed Discovery Confidentiality Order  
**Date:** Thursday, December 1, 2022 7:49:18 PM

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**[ External Email ]**

These objects are based on an intentionally and ridiculously literal interpretation of every persons communication. We both know there are a limited number of people involved. These are basic requests. Meeting and conferring, or in other words negotiate against myself, in order to limit your production is pointless.

Sincerely,

Patrick Trainor, Esq.

**THE LAW OFFICE OF PATRICK TRAINOR, ESQ., LLC**  
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**From:** Mulherin, Joseph <[Jmulherin@mwe.com](mailto:Jmulherin@mwe.com)>  
**Sent:** Thursday, December 1, 2022 8:32:13 PM  
**To:** Patrick Trainor, Esq. <[pt@PTESQ.COM](mailto:pt@PTESQ.COM)>; Starbuck, Emily <[Estarbuck@mwe.com](mailto:Estarbuck@mwe.com)>  
**Subject:** RE: D'Ambly - Proposed Discovery Confidentiality Order

Patrick,

Thank you for your email. Our disproportionate/irrelevance/over-breadth objections stem from you asking NYDN to search the email boxes of every employee at NYDN, including individuals who had no role in Mr. Exoo's termination. We are happy to meet and confer with you about your requests and our objections. What time works for you on Monday?

Best regards,  
Joe

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**From:** Patrick Trainor, Esq. <[pt@PTESQ.COM](mailto:pt@PTESQ.COM)>  
**Sent:** Thursday, December 1, 2022 7:15 PM  
**To:** Starbuck, Emily <[Estarbuck@mwe.com](mailto:Estarbuck@mwe.com)>  
**Cc:** Mulherin, Joseph <[Jmulherin@mwe.com](mailto:Jmulherin@mwe.com)>  
**Subject:** Re: D'Ambly - Proposed Discovery Confidentiality Order

**[ External Email ]**

The responses are a joke right? I mean you're claiming that producing the name(s) of the person(s) who disclosed D'Ambly's confidential personnel information to Exoo is overly burdensome? That's a five-word question. Do you want me to tell you those name(s) and their contact information to ease your burden?

And then you're objecting to number 3 because I asked for *every* (your emphasis), but number 4, similar question you respond by stating you are not aware of any responsive documents? Firstly, that's bush league and you know it. Secondly, I am aware of responsive documents that are in your client's possession, so there is no way you are not aware of responsive documents. Please amend because it will get awkward if I supplement my production with communications between Exoo and your client concerning D'Ambly and his termination. Personal cells and emails count.

See you in NY Post.

Sincerely,

Patrick Trainor, Esq.